

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

GOOGLE INC.,

Petitioner,

v.

TWENTY-FIRST CENTURY FOX, INC.,
NBCUNIVERSAL MEDIA, INC., and
VIACOM, INC.,

Respondents.

)
) CASE NO.: 1:15-mc-00150-P1
)
) CASE IN OTHER COURT:
) No. 3:14-cv-00981-HTW-LRA (S.D.
) Miss.)
)
) **ECF CASE**
)
)
)
)
)
)
)

**SUPPLEMENTAL DECLARATION OF MICHAEL H. RUBIN
IN SUPPORT OF GOOGLE INC.'S RULE 45 MOTION
TO COMPEL COMPLIANCE WITH SUBPOENA**

I, MICHAEL H. RUBIN, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am a partner with the law firm Wilson Sonsini Goodrich & Rosati, attorneys for Petitioner Google Inc. ("Google"). I submit this affidavit to supplement the affidavit I submitted on June 1, 2015, in further support of Google's Federal Rule of Civil Procedure 45 Motion to Compel Compliance with Subpoena (the "Motion") against Twenty-First Century Fox, Inc. ("Fox"), Viacom, Inc. ("Viacom"), and NBCUniversal Media, LLC ("NBC") (collectively, the "Subpoenaed Parties" or the "Studios"). The following facts are true of my personal knowledge and if called and sworn as a witness I could competently testify to them.

2. Along with others at my firm, I have been involved with Google's efforts to obtain discovery from third parties to support its claims against Mississippi Attorney General Jim Hood ("AG Hood") in *Google Inc. v. Hood* (3:14-cv-00981-HTW-LRA, S.D. Miss.) ("*Google Inc. v. Hood*").

3. On June 3, 2015, two days after Google filed the instant Motion, the Studios produced a total of 44 documents to Google in response to Google's subpoenas. Most documents were produced as Portable Document Format ("PDF") files.

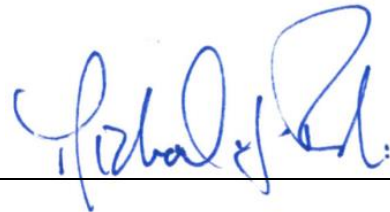
4. Attached hereto as Exhibit 1 is a true and correct copy of a list of donations by Fox and Fox related entities to AG Hood's campaign committee and to the Democratic Attorneys General Association that was produced by Fox and Bates Numbered FOX000013-14.

5. Attached hereto as Exhibit 2 is a true and correct copy of a list of donations by NBC's political action committee to AG Hood's campaign committee that was produced by NBC and Bates Numbered NBCU000027.

6. Attached hereto as Exhibit 3 is a true and correct copy of a March 10, 2014 email exchange between Mary Jo Woods and Mike Moore that was produced by the law firm of Jenner & Block LLP ("Jenner") to Google on June 12, 2015 in response to a separate subpoena and Bates Numbered JB_00000390-91.

7. Attached hereto as Exhibit 4 is a true and correct copy of a June 4, 2014 email exchange between Rob McKenna, AG Hood, Brian Moran and Tom Perrelli that was produced by Jenner and Bates Numbered JB_00000400-01.

Pursuant to 28 U.S.C. § 1746, I certify under penalty of perjury that the foregoing is true and correct. Executed on June 22, 2015 in San Francisco, California.



Michael H. Rubin